

REMARKS

Claims 1-20 are pending. Claims 1, 5, 8, and 15 have been amended to provide proper antecedent basis and to clarify the wording of various claims. No claims have been added or deleted. No new matter has been added.

INTERVIEW WITH EXAMINER

On Wednesday, March 23, 2004, the attorney for Applicants, John Wagner, conducted an interview with Examiner Rosario-Vasquez and his supervisor Examiner, Leo Boudreau. During the interview, the attorney for the Applicants discussed the claims and the references. The examiners are thanked for the interview.

CLAIM OBJECTIONS

Claim 15

In paragraph 7, Claim 15 was objected to under 37 CFR 1.75(a) as failing to particular point out and distinctly claim the subject matter which the applicant regards as his invention or discovery. Further, paragraph 8 states, "the current input pixel has no antecedent basis. Is 'the current input pixel' referring to 'for each input pixel' in line 4 of claim 15?" Claim 15 has been amended to fix this antecedent basis problem. Therefore, applicants believe that this objection has been addressed.

102(b) REJECTIONS

Claims 1-17 and 19-20

In paragraph 10 of the Office Action, Claims 1-17 and 19-20 are rejected under 35 U.S.C. § 102(b) as being anticipated by Vehvilainen (US Patent No.6,504,873 B1). The Applicants have reviewed the cited references and respectfully submit that embodiments of the present invention as recited in Claims 1-17 and 19-20 are neither taught nor anticipated by Vehvilainen.

Amended independent Claim 1 recites,
a filter selection mechanism for receiving an input pixel window and
responsive thereto for generating a filter identifier based on one
of

an edge parameter computed based on the input pixel window
and

an activity metric computed based on the input pixel window,
wherein a combination of both the edge parameter and the activity metric is
not required for the generating of the filter identifier.

In contrast, Vehvilainen teaches, "The selection of which ("smooth",
"moderate" or "high activity") should be used is based on the measurement of
both edge variance and variance inside the block, at Col. 9 lines 8-10. Further,
equation 2 depicted at Col. 9, lines 54-59 clearly depicts a conditional clause for
processing that is based on both the variance inside of the block (e.g.,
activityIN) and the edge variance (e.g., activityEDGE).

Therefore, Vehvilainen does not teach or suggest, "a filter selection
mechanism for receiving an input pixel window and responsive thereto for
generating a filter identifier based on one of an edge parameter computed
based on the input pixel window and an activity metric computed based on the
input pixel window, wherein a combination of both the edge parameter and
the activity metric is not required for the generating of the filter identifier," as
recited in Claim 1.

Vehvilainen does not teach or suggest amended independent Claims 8
and 15 for similar reasons that Vehvilainen does not teach or suggest amended
independent Claim 1. Claims 2-7 are dependent on Claim 1, Claims 9-14
depend on Claim 8, and Claims 16, 17, and 19- 20 depend on Claim 15. Further,
Claims 2-7, 9-14, 16, 17, and 19- 20 recite additional limitations. Therefore,
Applicants respectfully submit that the basis for rejecting Claims 1-17 and 19-20
under 35 U.S.C. § 102(b) is traversed.

The office action also states that "Claims 4 and 5 were also rejected
under the 'one of' limitation." Applicants respectfully submit that Claim 4 does
not include any wording of the nature "one of" and therefore, Applicants
respectfully submit that the basis for rejection Claim 4 is traversed. Claim 5 has
been amended to recite a Markush clause instead of the wording "one of."

Therefore, Applicants respectfully submit that the basis for rejecting Claim 5 has been addressed.

103(a) REJECTIONS

Claim 18

In paragraph 12 of the Office Action, Claim 18 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Vehvilainen in view of Ghaderi (US Patent No.6,504,863 B1). The Applicants have reviewed the cited references and respectfully submit that the present invention as recited in Claim 18 is not anticipated nor rendered obvious by Vehvilainen and Ghaderi, alone or in combination.

Applicants respectfully submit that Ghaderi does not overcome the shortcomings of Vehvilainen. Therefore, Applicants respectfully submit that Vehvilainen and Ghaderi, alone or in combination, do not show nor suggest the present invention as recited in independent Claim 15, and that this claim is considered patentable over Vehvilainen and Ghaderi (alone or in combination). Because Claim 18 depends on Claim 15 and contains additional limitations that are patentably distinguishable over Vehvilainen and Ghaderi (alone or in combination), this claim is also considered patentable over Vehvilainen and Ghaderi (alone or in combination). Therefore, Applicants respectfully submit that the basis for rejecting Claim 18 under 35 U.S.C. § 103(a) is traversed.

Conclusions

In light of the above remarks, Applicants respectfully request reconsideration of the rejected claims.

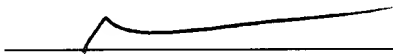
Based on the arguments presented above, Applicants respectfully assert that Claims 1-20 overcome the rejections of record and, therefore, Applicants respectfully solicit allowance of these claims.

Applicants have reviewed the references that the Office Action cited but did not rely upon and respectfully submit that these references neither teach nor suggest the claimed invention.

The Examiner is invited to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted,
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